

**Subject:** Re: Vann v. City et al, 18-cv-6464; RFPs per 4-13-21 order  
**Date:** Monday, November 14, 2022 at 2:15:45 PM Eastern Standard Time  
**From:** Elliot Shields  
**To:** Campolieto, John M.  
**CC:** David Roth  
**Category:** Filed to Clio  
**Attachments:** image001.jpg

John,

It was nice chatting with you last week at Founders. I want to get these depositions scheduled, but as we discussed, I want to see the IA/PSS files we demanded first. I think that Stephanie Mintz is the only officer who didn't have any IA files listed in our demands.

During our discussion at Founders, you indicated defendants were likely going to object to producing some of the demanded IA / PSS files.

A couple questions: First, do you plan to respond tomorrow, as stated in your prior email? Second, if you can tell me if you are going to produce the demanded files for the defendant officers, then we can get those depositions scheduled.

I plan to do them all virtually, other than Drake, Kester, Mitchell and the 30b6 deposition.

Thanks,  
Elliot

Elliot Shields, Esq. (he/him)  
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**From:** Elliot Shields <[eshields@rothandrothlaw.com](mailto:eshields@rothandrothlaw.com)>  
**Date:** Thursday, November 3, 2022 at 3:00 PM  
**To:** Campolieto, John M. <[John.Campolieto@CityofRochester.Gov](mailto:John.Campolieto@CityofRochester.Gov)>  
**Cc:** David Roth <[droth@rothandrothlaw.com](mailto:droth@rothandrothlaw.com)>

**Subject:** Re: Vann v. City et al, 18-cv-6464; RFPs per 4-13-21 order

Dear John,

I'll let you know what depositions I can do without the discovery, and we can get those scheduled. The remainder of the discovery demanded, per the order, ECF 57, consisted of:

**6. Officer Personnel Files and Misconduct Records:** Defendants agreed and shall produce all “substantiated” and “unsubstantiated” records of civilian and internal complaints of misconduct for the Other Identified Officers and Officer Defendants. This includes the complete personnel files, Professional Standard Section files, Civilian Review Board files, disciplinary records, all complaints of misconduct, and all internal investigatory records for complaints of misconduct.

None of the misconduct records in my October 10, 2022 demands have yet been produced. Per the order, and as explained in the demands, I did an exhaustive comparison of what was already provided, the lists, and the concise officer histories for the officer defendants and “other identified officers”, and provided demands by specific IA numbers.

It is a lot of records, and so I don't think you are going to be able to produce everything by November 15. That's fine. I'm willing to provide a reasonable extension for you to produce the records. I just don't want to schedule depositions before I get the records, then have to cancel them because you weren't able to produce the records by November 15.

Thank you,  
Elliot

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**From:** Campolieto, John M. <[John.Campolieto@CityofRochester.Gov](mailto:John.Campolieto@CityofRochester.Gov)>  
**Date:** Wednesday, November 2, 2022 at 12:40 PM  
**To:** Elliot Shields <[eshields@rothandrothlaw.com](mailto:eshields@rothandrothlaw.com)>  
**Cc:** David Roth <[droth@rothandrothlaw.com](mailto:droth@rothandrothlaw.com)>  
**Subject:** RE: Vann v. City et al, 18-cv-6464; RFPs per 4-13-21 order

Elliot—As my email stated got done with a trial issue—more specifically, I can review all of the discovery we

have sent and get you anything remaining by November 15. I also have reserved the first two weeks of December for you to conduct your depositions if that is convenient to you.



**John M. Campolieto**

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**From:** Elliot Shields <[eshields@rothandrothlaw.com](mailto:eshields@rothandrothlaw.com)>  
**Sent:** Wednesday, November 2, 2022 12:34 PM  
**To:** Campolieto, John M. <[John.Campolieto@CityofRochester.Gov](mailto:John.Campolieto@CityofRochester.Gov)>  
**Cc:** David Roth <[droth@rothandrothlaw.com](mailto:droth@rothandrothlaw.com)>  
**Subject:** Re: Vann v. City et al, 18-cv-6464; RFPs per 4-13-21 order

John,

You are in violation of the order. I don't want to make a motion for sanctions, so please tell me when you are going to comply with the order.

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**From:** Elliot Shields <[eshields@rothandrothlaw.com](mailto:eshields@rothandrothlaw.com)>  
**Date:** Monday, October 31, 2022 at 3:49 PM

**To:** Campolieto, John M. <[John.Campolieto@CityofRochester.Gov](mailto:John.Campolieto@CityofRochester.Gov)>

**Subject:** Re: Vann v. City et al, 18-cv-6464; RFPs per 4-13-21 order

John,

I'm not sure what you mean. The order and my demands are very clear, in my opinion. I need the records prior to doing some of the depositions, which is why I haven't scheduled them yet. Please call me to discuss, or let me know when you are going to comply with the order.

Thank you,  
Elliot

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**From:** Campolieto, John M. <[John.Campolieto@CityofRochester.Gov](mailto:John.Campolieto@CityofRochester.Gov)>

**Date:** Monday, October 31, 2022 at 3:08 PM

**To:** Elliot Shields <[eshields@rothandrothlaw.com](mailto:eshields@rothandrothlaw.com)>

**Subject:** RE: Vann v. City et al, 18-cv-6464; RFPs per 4-13-21 order

I appreciate your reminder Elliot. I have just finished a trial Elliot so I will need an additional few days to understand what you are looking for in relation to what we provided. I am free the first two weeks of December for depositions that you want to schedule at your convenience.



**John M. Campolieto**

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**From:** Elliot Shields <[eshields@rothandrothlaw.com](mailto:eshields@rothandrothlaw.com)>  
**Sent:** Wednesday, October 26, 2022 12:04 PM  
**To:** Campolieto, John M. <[John.Campolieto@CityofRochester.Gov](mailto:John.Campolieto@CityofRochester.Gov)>  
**Cc:** David Roth <[droth@rothandrothlaw.com](mailto:droth@rothandrothlaw.com)>; Audra Roth <[aroth@rothandrothlaw.com](mailto:aroth@rothandrothlaw.com)>  
**Subject:** Re: Vann v. City et al, 18-cv-6464; RFPs per 4-13-21 order

John, just left you a voicemail. Please confirm that you'll be producing the records, per Judge Pedersen's order, by November 1. And please call me back about scheduling depositions.

Thanks,

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**From:** Elliot Shields <[eshields@rothandrothlaw.com](mailto:eshields@rothandrothlaw.com)>  
**Date:** Monday, October 10, 2022 at 5:30 PM  
**To:** Campolieto, John (Other) <[john.campolieto@cityofrochester.gov](mailto:john.campolieto@cityofrochester.gov)>  
**Cc:** David Roth <[droth@rothandrothlaw.com](mailto:droth@rothandrothlaw.com)>, Audra Roth <[aroth@rothandrothlaw.com](mailto:aroth@rothandrothlaw.com)>  
**Subject:** Vann v. City et al, 18-cv-6464; RFPs per 4-13-21 order

John,

Please see the attached demands per Judge Pedersen's April 13, 2021 Order, ECF 57. Per the Order, please produce all the demanded files within three weeks, or by November 1, 2022.

Thank you,

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